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**Mark E. Bini**

Direct Phone: +1 212 549 0296

Email: mbini@reedsmith.com

Reed Smith LLP  
599 Lexington Avenue  
New York, NY 10022-7650  
+1 212 521 5400  
Fax +1 212 521 5450  
reedsmith.com

April 16, 2024

**Via ECF**

The Honorable Vincent L. Briccetti  
United States District Court Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

Re: *United States v. Tilson*, 23-CR-640 (S.D.N.Y.)

Dear Judge Briccetti:

We write on behalf of the defendant Mr. Eli Tilson in the above-referenced matter to request a temporary modification of Mr. Tilson's conditions of release to permit Mr. Tilson to travel with his family from Seattle to Hollywood, Florida to celebrate Passover. Mr. Tilson plans to travel from Seattle to Florida on Sunday morning, April 21, 2024, and return to Seattle on Wednesday night, May 1, 2024. During his time in Florida, Mr. Tilson will be staying at a home his mother-in-law rented for her and her children and their families to spend Passover together, the address of which has been provided to Pretrial Services and the Government.

We have conferred with counsel for the Government, who does not object to Mr. Tilson's requested bond modification. We have also conferred with Pretrial Services in both the Southern District of New York and the Western District of Washington, each of whom take no position on this request.

We thank the Court for its attention to this matter.

Very truly yours,

/s/ Mark E. Bini

Mark E. Bini, Esq.

Kaela Dahan, Esq.

*Counsel for Defendant Eliezer Tilson*

cc: All counsel of record (by ECF)  
S.D.N.Y. Pretrial Services Officer Shannon Finneran (via e-mail)  
W.D. Wash. Pretrial Services Officer Michael Munsterman (via e-mail)